

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

TIMOTHY P. NEUMANN, ESQ. [TN6429]
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*Attorneys for Debtor-in-Possession
American Center for Civil Justice, Inc.*

In Re:

AMERICAN CENTER FOR CIVIL JUSTICE, INC.,

Debtor.

Chapter 11

Case No.: 18-15691

Judge: Christine M. Gravelle

**CERTIFICATION OF TIMOTHY NEUMANN IN OPPOSITION TO MOTION OF
MICHAEL ENGELBERG FOR APPOINTMENT OF A CHAPTER 11 TRUSTEE**

Timothy Neumann, of full age, hereby certifies, as follows:

1. I am the attorney for the American Center for Civil Justice, Inc. (“Debtor”).
2. I submit this Certification in response to the motion of Michael Engelberg for the appointment of a Chapter 11 trustee (the “Engelberg Trustee Motion”) filed on January 22, 2018[DE¹ 317].
3. Th Engelberg Trustee Motion is supported solely by the certification of David Howe [DE 317-1] which states that the Engelberg Trustee Motion was filed to preserve the pending joinder of a motion to appoint a Chapter 11 trustee filed by Robert Tolchin on behalf of the Campuzano Claimants [the “Campuzano Trustee Motion,” DE 43] in case the “Campuzano Claimants should decide to withdraw their motion to appoint a Chapter 11 trustee.”
4. The Howe Certification adds no new evidence but incorporates by reference the Campuzano Trustee Motion, Engelberg’s joinder in the Campuzano trustee Motion [DE 58], a reply in

¹ “DE” followed by a numerical value refers to a specific docket entry on the Court’s docket in this Chapter 11 case.

further support of the Campuzano Trustee Motion [DE 64] and a Supplemental Joinder which included across-motion for the appointment of an examiner filed by Engelberg [DE 285].

5. The Howe Certification notes the filing by the Debtor of the Certification of Neal Sher [DE 59] a Brief [DE 60], a letter from Eliezer Perr [DE 91], and a reply to the Supplemental Joinder [DE 289]
6. The Debtor hereby incorporates all of the submissions noted in the previous paragraph as and for its opposition to the instant Engelberg Trustee Motion.

I certify that the above statements of fact are true. I acknowledge that if any of the above statements of fact are willfully false, I am subject to punishment.

January 30, 2019

/s/ Timothy Neumann
Timothy Neumann